

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LYNWOOD MOREAU, *et al.*

Plaintiff,

v.

HARRIS COUNTY, TEXAS,

Defendant.

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CIVIL ACTION NO. 4:19-CV-00646

DEFENDANT HARRIS COUNTY, TEXAS' REQUESTED JURY VOIR DIRE

Defendant Harris County, Texas ("Harris County") respectfully requests the following questions be asked of the jury panel:

1. The Plaintiffs in this case are Christopher Adolph, Eric Batton, Paul Bruce, Bryan Buccini, Bryan Chrles, Simon Cheng, Cedrick Collier, Susan Cotter, Earl Dean, Nathan Douglas, Jeffrey Easthagen, Linda Easthagen, Chris Ecke, Larry Fanks, David Fusilier, Jorge Gonzalez, Toby Kroger, Wendell Kuhlman, John Lightfoot, Edward Lopez, James, Lovett, Anthony McConnell, Lynwood Morea, Jeffrey Stauber, Darlene Thomas, Lonnie Tullos, Jonahtan Vinigre, James Wagner, and Lameka White, Does anyone know any of them?

2. Does anyone know the Plaintiffs' lawyers, Curte Hesse, Melissa Moore or know anyone who works at their law firm, Moore and Associates?

3. Does anyone know Bridget Davidson, or know anyone who works at the Space City law firm?

4. Does anyone know Robin Foster or anyone associated with the Harris County Deputies' Organization?

5. Is there anyone who has been a plaintiff, or who has had a close friend or family member who has been a plaintiff, in a civil lawsuit?

6. Have you, any member of your family, or any close friends ever filed a lawsuit, complaint or grievance against an employer?

7. Have you, any member of your family, or any close friends ever filed a claim, complaint, lawsuit or grievance related to your pay?

8. Have you, any member of your family, or any close friends ever contacted the Department of Labor or the Texas Workforce Commission claiming that you were not paid wages to which you felt you were entitled?

9. Is anyone here a member of law enforcement of any kind, such as police officer, a state trooper, a deputy sheriff, or a deputy constable?

10. Does anyone have any family members or close friends who are a member of law enforcement of any kind, such as police officers, state troopers, deputy, or a constable?

11. Have you, any member of your family, or any close friends ever filed a claim, complaint, lawsuit or grievance complaining about Harris County, Texas, or any of its employees or elected or appointed officials?

12. Does anyone have any strong feelings about Sheriff Ed Gonzalez or the Harris County Sheriff's Office?

13. Does anyone know the Harris County's lawyers, Carolyn Russell, Stephen Quezada, Ryan Swink, Amanda Croushore, or know anyone who works at their law firm, Ogletree, Deakins, Nash, Smoak & Stewart, P.C.?

14. Do you know Assistant Chief Thomas Diaz?

15. Have you, your family members, or any of your close friends had any interactions with the Harris County Sheriff's Office that would make you feel positively or negatively about how Harris County treats the Sheriff's Office employees?

16. Do any of you know any facts about this case or any similar ones? For instance, has anyone followed any news accounts of lawsuits involving employees seeking overtime wages?

17. Does anyone have any specialized legal knowledge involving wage and hour law, the Fair Labor Standards Act, or overtime law in general?

18. Is anyone here an attorney, work for an attorney, or have family members or close friends who are attorneys?

19. Is anyone here employed in the law enforcement field, or have family members or close friends who are employed in the law enforcement field?

20. Have you or any member of your family ever worked for Harris County, Texas or the Harris County Sheriff's Office?

21. Do you, any member of your family, or any close friends work for, or previously worked for, the Department of Labor or the Texas Workforce Commission?

22. Have you or any member of your family ever had a dispute with Harris County?

23. Does anyone here have any pre-conceived opinions regarding law enforcement that may cause you to be less than fair and impartial juror?

24. Have you or any members of your family ever been trained, educated or worked in law enforcement, corrections or the legal system?

25. Does anyone here believe that a member of law enforcement should be believed more than anyone else simply because they are a law enforcement officer?

26. Have any of you ever been a member of a jury where a law enforcement officer or Harris County Government official was accused of wrongdoing?

27. Is there anyone who feels that a plaintiff who files a lawsuit deserves to get what they ask for just because they filed the lawsuit?

28. Is there anyone who has applied for employment with Harris County?

29. Have you, any member of your family, or a close friend ever sued a government such as a county, city or state?

30. The Court will instruct you on the law as it applies to whether employees are entitled to overtime. Would you be able and willing to follow the Court's instructions concerning the law, even if the instructions are different from your own personal views?

31. Has anyone formed an opinion based only on what you have heard so far?

32. Have any of you ever served on a jury before? If so, what type of case? Did you reach a verdict? Was the verdict unanimous? Were any of you the foreperson of the jury?

33. Have any of you ever held elected office for government? If so, what office and when?

34. Have any of you served as officers in any religious, recreational or political organization? If so, what office, when and what type of organization?

35. Based on everything you now know about this case, do you feel that there is any reason why you cannot render a fair and impartial verdict based solely on the evidence you hear at trial and the law as the judge instructed you in this case, and without regard to passion, prejudice, or sympathy?

Respectfully submitted,

/s/ Carolyn Russell

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of July, 2024, the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

*/s/ Carolyn Russell*_____

Carolyn Russell